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14 TRANS UNION LLC

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

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13 SERGIO L. RAMIREZ, on behalf of himself) Case No. 3:12-cv-00632-JSC
14 and all others similarly situated,)
15 Plaintiff,) [Assigned to the Honorable Jacqueline Scott
16 v.) Corley]
17 TRANS UNION, LLC,)
18 Defendant.)
19)
20)
21)

STIPULATION AND [PROPOSED] ORDER
AMENDING BRIEFING SCHEDULE
Case No. 3:12-cv-00632-JSC

1 WHEREAS, on August 1, 2012, defendant Trans Union, LLC ("Trans Union") filed a
 2 Motion for Judgment on the Pleadings Pursuant to Fed. R. Civ. P. 12(c) and to Strike Pursuant to
 3 Fed. R. Civ. P. 12(f) (the "Motion");

4 WHEREAS, pursuant to Civil Local Rule 7-3(a), the Opposition of plaintiff Sergio L.
 5 Ramirez ("Plaintiff") to the Motion is due not later than August 15, 2012;

6 WHEREAS, pursuant to Civil Local Rule 7-3(c), Trans Union's Reply in support of the
 7 Motion is due not later than August 22, 2012;

8 WHEREAS, the Motion is set for hearing on October 11, 2012;

9 WHEREAS, to allow the parties sufficient time to prepare their Opposition and Reply
 10 papers, and because Plaintiff's counsel has a vacation scheduled for mid-August, the parties agree
 11 that a brief continuance of the foregoing dates is appropriate;

12 WHEREAS, pursuant to Local Rules 6-1(b) and 6-2, the parties may request an order
 13 changing time that would affect the date of an event or deadline already fixed by Court order;

14 WHEREAS, the parties previously stipulated to the extension of the date by which Trans
 15 Union was required to respond to the initial Complaint on March 7, 2012, March 16, 2012 and
 16 March 29, 2012;

17 WHEREAS, this Stipulation is made in good faith and not for purposes of delay;

18 IT IS HEREBY STIPULATED, by and between the parties, through their respective
 19 counsel of record, that:

20 1. The date by which Plaintiff must file his Opposition to the Motion is continued from
 21 August 15, 2012 to September 7, 2012;

22 2. The date by which Trans Union must file its Reply in support of the Motion is
 23 continued from August 22, 2012 to September 21, 2012;

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3. The hearing date on the Motion shall remain October 11, 2012.

IT IS SO STIPULATED

Dated: August 1, 2012

STROOCK & STROOCK & LAVAN LLP
JULIA B. STRICKLAND
STEPHEN J. NEWMAN
BRIAN C. FRONTINO
A. R. KACHADOORIAN
JEFFREY B. BELL

By: _____ /s/ Jeffrey B. Bell
Jeffrey B. Bell

Atorneys for Defendant
TRANS UNION LLC

Dated: August 1, 2012

ANDERSON, OGILVIE & BREWER, LLP
ANDREW J. OGILVIE
CAROL MCLEAN BREWER

**FRANCIS & MAILMAN, P.C.
JOHN SOUMILAS**

By: _____ /s/ John Soumilas
John Soumilas

Attorneys for Plaintiff
SERGIO L. RAMIREZ

[PROPOSED] ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: _____, 2012

Hon. Jacqueline Scott Corely
United States District Court Judge

STROOCK & STROOCK & LAVAN LLP
2029 Century Park East
Los Angeles, California 90067-3086

**STIPULATION AND [PROPOSED] ORDER
AMENDING BRIEFING SCHEDULE**
Case No. 3:12-cv-00632-JSC

DECLARATION OF JEFFREY B. BELL

I, Jeffrey B. Bell, hereby declare as follows:

1. I am admitted to practice before this Court and am associate at Stroock & Stroock & Lavan LLP (“Stroock”), counsel for defendant Trans Union, LLC in this action. I submit this Declaration in support of the Stipulation and [Proposed] Order Amending Briefing Schedule (the “Stipulation”), in accordance with Section X.B. of General Order 45 and Civil Local Rule 5-1(i)(3) of this Court. The facts set forth herein are true of my own personal knowledge. If called as a witness, I could and would competently testify thereto.

2. On August 1, 2012, John Soumilas, counsel for plaintiff Sergio L. Ramirez, contacted me by e-mail and approved the content of the Stipulation, which was sent to him for his review and approval on July 31, 2012, and authorizing me to execute it on his behalf.

I declare under the penalty of perjury under the laws of the United States of America that
the foregoing is true and correct. Executed this August 1, 2012.

/s/ Jeffrey B. Bell
Jeffrey B. Bell

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2 **CERTIFICATE OF SERVICE**
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4 I hereby certify that on August 1, 2012, a copy of the foregoing **STIPULATION AND**
5 **[PROPOSED] ORDER AMENDING BRIEFING SCHEDULE** was filed electronically and
6 served by mail on anyone unable to accept electronic filing. Notice of this filing will be sent by e-
7 mail to all parties by operation of the court's electronic filing system or by mail to anyone unable to
8 accept electronic filing as indicated on the Notice of Electronic Filing. Parties may access this
9 filing through the court's EM/ECF System.

10 _____
11 /s/ Jeffrey B. Bell
12 Jeffrey B. Bell
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28 STIPULATION AND [PROPOSED] ORDER
 AMENDING BRIEFING SCHEDULE
 Case No. 3:12-cv-00632-JSC